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UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

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Claimant and Creditor

**CLAIMANT RESPONSE TO THE NOTICE OF THE REORGANIZED
DEBTORS' FORTY-FIRST OMNIBUS OBJECTIONS TO CLAIMS**

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:) Bankruptcy Case No. 19-30088 (DM),
) Proof of Claim No.: 80924, and
PG&E CORPORATION) Proof of Claim No.: 80468
)
- and -) (Lead Case) (Jointly Administered)
)
PACIFIC GAS AND ELECTRIC COMPANY,) Chapter 11.
)
Debtors.) CLAIMANT RESPONSE TO THE NOTICE OF THE REORGANIZED DEBTORS' FORTY-FIRST OMNIBUS OBJECTION TO CLAIMS

This Response affects both Debtors.

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Creditor Name: Jurkovic, Michael

The intent of the original claim filings is that there is a claim of \$80,000.00 filed against both **PG&E Corporation** (Case No. 19-30088) and **Pacific Gas and Electric Company** (Case No. 19-30089). There is no intent to exclude either of the two debtors from liability for the damage that was caused to my property. The Proof of Claim form (Official Form 410) listed both of the above debtors with a checkbox preceding each debtor and specific instructions to "Fill in this information to identify the case (**Select only one Debtor per claim form**):" so that an option to hold both debtors liable for the damage they caused was not possible given the constraints of a single printed Proof of Claim form. As such, two claim forms were submitted, one listing **PG&E Corporation** as the debtor, and the other listing **Pacific Gas and Electric Company** as the debtor. These are not duplicate Proof-of-Claim forms.

PLEASE NOTE: Primeclerk records indicate that a clerical error has been made in the processing of claims 80924 and 80468. The records appear to indicate that they both specify **PG&E Corporation** as the debtor. This is incorrect. One of these claims was filed specifying **PG&E Corporation** as the debtor, and the other claim specified **Pacific Gas and Electric Company** as the debtor. Copies of the original Proof-of-Claim forms confirm the debtor specifications listed above.

The damage to my property was caused gradually over the course of many visits to my property. Personnel that visited my property and caused the damage include operations personnel who were employed by **Pacific Gas and Electric Company**, as well as other personnel who were ordered by **PG&E Corporation** to perform actions on behalf of **PG&E Corporation** that resulted in damage to my property. Thus, both debtors are liable for the damage that was caused and a claim is filed against both **Pacific Gas and Electric Company** and **PG&E Corporation** while the components of liability that are attributable to each debtor are to be determined. Each of the claims that have been filed are intended to seek damages caused by personnel acting on behalf each of the two debtors individually for the damages they caused.

In review of the claim, I own a vacant lot (contra Costa County APN 370-110-019) on St. Mary's Street in Martinez CA. This property was damaged by actions taken by **Pacific Gas and Electric Company** and **PG&E Corporation** and their agents for an unknown period of time up to and including 1/29/19.

The actions taken by the debtors to trim the trees on all of the properties on St. Mary's Street, Martinez is well known that personnel from **PG&E Corporation**, **Pacific Gas & Electric Company**, and their agents came to my property to trim the trees. Long-term residents living on St. Mary's in Martinez state that they have witnessed personnel from **PG&E Corporation**, **Pacific Gas & Electric Company** visiting my property and trimming the trees over the course of many years on numerous occasions.

My parcel APN 370-110-019 is on a hillside where St. Mary's Street runs up the hill and my parcel APN 370-110-019 slopes downward from St. Mary's street. The downward slope of my parcel from the street is very steep at about 45degrees. There are several trees that are several feet from the curb on my property that are at the edge of this steep slope. As such, the root systems of these trees have the ability to extend downward below the trunk, along the edge of St. Mary's Street, and under St. Mary's street. However, the root systems of these trees do not extend out away from the street because of the steep 45degree downward slope extending from the street into my parcel. There are **PG&E** power

lines that run along St Mary's street on my parcel's side of the street that are about 30 to 50 up from the curb. These power lines run through the above mentioned trees on my property. **Pacific Gas and Electric Company** and **PG&E Corporation** have been responsible sending personnel to my property on many occasions for cutting the trees and branches of these trees so that the interference with the power lines is minimized. However, over time, the trees on my property have become extremely lopsided, with heavy branches extending out over my parcel many tens of feet away from the street with no roots to support them due to the steep downward slope from the street. On the street-side of these trees, the tens of feet of branches extending laterally from the trunks out into the street have been cut away by personnel on behalf of **Pacific Gas and Electric Company** and **PG&E Corporation**. The result is there are a row of trees several feet from the curb on my parcel that have been cut by personnel on behalf of **Pacific Gas and Electric Company** and **PG&E Corporation** so as to be lopsided and prone to falling over because the weight of the branches that would have kept them balanced at the edge of the steep slope have been cut away by **Pacific Gas and Electric Company** and **PG&E Corporation** and their agents.

One of these trees (an old huge eucalyptus) has already fallen over and it has cost me many thousands of dollars to remove the fire hazard presented by the tree that has toppled over away from St. Mary's street and down the 45degree slope on my parcel. Remaining trees will likely fall over down the slope on my parcel in similar fashion in time due to the damage and dangerous conditions **Pacific Gas and Electric Company** and **PG&E Corporation** caused by sending personnel to my property to cut my trees in order to maintain their power lines.

As stated on the PG&E website in the September 9th, 2019 news release entitled "PG&E Files Joint Chapter 11 Plan of Reorganization Plan Positions the Company to Meet Commitment to Compensate Victims, Continue Making Changes to Improve Operations"
Release Date: September 09, 2019

located at the URL:

[https://www.pge.com/en/about/newsroom/newsdetails/index.page?
title=20190909_pge_files_joint_chapter_11_plan_of_reorganization](https://www.pge.com/en/about/newsroom/newsdetails/index.page?title=20190909_pge_files_joint_chapter_11_plan_of_reorganization)

"About PG&E Corporation

PG&E Corporation (NYSE: PCG) is a holding company headquartered in San Francisco. It is the parent company of Pacific Gas and Electric Company, an energy company that serves 16 million Californians across a 70,000-square-mile service area in Northern and Central California. **Each of PG&E Corporation and the Utility is a separate entity, with distinct creditors and claimants, and is subject to separate laws, rules and regulations.** For more information, visit <http://www.pgecorp.com>."

Since the proportion of liability that is owed to me by each debtor is to be determined by the facts of the case, one of the following 2 options is proposed:

1. Both claims #80468 and #80924 remain as submitted with the understanding that the total sum of award for both claims is not to exceed \$80,000.00.
2. The surviving claim #80468 that is proposed by the attorneys for the Debtors and Reorganized

Debtors must be amended to include both debtors: **PG&E CORPORATION** and **PACIFIC GAS AND ELECTRIC COMPANY.**

Dated: December 1, 2020

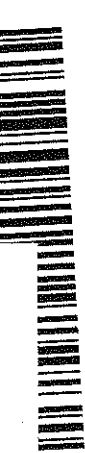
MICHAEL JURKOVIC

/s/ Michael Jurkovic

Michael Jurkovic

Claimant and Creditor

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SAN FRANCISCO, CA

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